



State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES

29 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095
(603) 271-3503 FAX (603) 271-2982



Town of Northumberland
Town Office
2 State Street
Groveton, NH 03582

**ADMINISTRATIVE ORDER
BY CONSENT
No. WD 03-029**

Re: Northumberland and Groveton
Wastewater Treatment Facilities

A. INTRODUCTION

This Administrative Order by Consent is issued by the Department of Environmental Services, Water Division to, and with the consent of, the Town of Northumberland, pursuant to RSA 485-A:22. This Administrative Order by Consent is effective upon signature by both parties.

B. PARTIES

1. The Department of Environmental Services, Water Division ("DES"), is a duly constituted administrative agency of the State of New Hampshire, with its principal office at 29 Hazen Drive, Concord, NH.
2. The Town of Northumberland ("the Town") is a duly constituted municipality of the State of New Hampshire having a mailing address of 2 State Street, Groveton, NH 03582.

C. STATEMENTS OF FACTS AND LAW

1. Pursuant to RSA 485-A:8 and RSA 485-A:13 and related sections, DES regulates the discharge of pollutants to surface waters and has developed a permit system. As part of this program, the Commissioner of DES adopted Env-Ws 401-405 relating to Surface Water Discharge Permits and adopted Env-Ws 1700 establishing Surface Water Quality Regulations for the state's surface waters.
2. The Town owns and operates two wastewater treatment facilities. The first is located at Northumberland Village, on Route 3, Northumberland, NH (hereinafter "Northumberland WWTF"). The second facility is located on Eames Street, Groveton, NH (hereinafter "Groveton WWTF").
3. Operation of the Northumberland and Groveton WWTFs is permitted under the terms of federal National Pollutant Discharge Elimination System ("NPDES") permit numbers NH0101206 and NH0100226, respectively, issued by the United States Environmental Protection Agency ("USEPA") to the Town on August 30, 1984, and March 5, 1984, respectively. These NPDES permits were adopted as State discharge permits under RSA 485-A:13, I (a) and New Hampshire Administrative Rules Env-Ws 401 and 402. The federal and state permits are collectively referred to hereinafter as the "NPDES Permits".

4. The NPDES Permits authorize the Town to discharge treated wastewater from the Northumberland WWTF to the Connecticut River, and from the Groveton WWTF to the Upper Ammonoosuc River, subject to specified effluent limitations, monitoring requirements, and other conditions.
5. Pursuant to the Laws of 1967, 311:1, the Upper Ammonoosuc River and its tributaries, and the Connecticut River, are classified as Class B waters.
6. Pursuant to Env-Ws 405.02 (e) copies of the USEPA Discharge Monitoring Reports ("DMRs") shall be postmarked and sent to DES by the fifteenth day of the following month for each reporting month as required by the NPDES Permits.
7. For the monitoring period April 2001 through January 2003, the Town submitted DMRs for the Northumberland WWTF postmarked beyond the fifteen days limit for six reporting periods. For the monitoring period February 2003 through August 2003, the DMRs have been submitted on time.
8. For the monitoring period April 2001 to February 2003, the Town submitted DMRs for the Groveton WWTF postmarked beyond the fifteen days limit for nine reporting periods. For the monitoring period February 2003 through August 2003, the DMRs have been submitted on time.
9. The DMRs must be signed by an authorized agent to certify the information provided is accurate and complete. Based on DES's detailed reviews of DMRs for years 2002 and 2003 for the Northumberland and Groveton WWTFs, the DMRs submitted contain numerous reporting errors and are not considered accurate.
10. DMR reporting errors were also cited as deficiencies during inspections conducted on April 4, 1997, May 3, 2000 and May 22, 2002. Attachment 1 provides a brief summary of the inspection findings.
11. For the monitoring period January 1999 through August 2003, numerous calculation, transcription and reporting errors are noted on Monthly Operations Reports ("MORs"), DMRs and bench sheets submitted for the Northumberland and Groveton WWTFs. For the Northumberland WWTF, DES has sent edited DMRs back to the Town for correction and resubmission every month from November 2001 through November 2003 except for May 2003, August 2003 and October 2003. For the Groveton WWTF, DES has sent edited DMRs back to the Town for correction and resubmission every month from November 2001 through November 2003 except for August 2003. The MORs summarize monitoring data required under Part II, Section C of the NPDES Permits and pursuant to Env-Ws 405.02 (f) and are used to develop the information reported on the DMRs. Attachment 1 contains a list of the errors noted.
12. NPDES Permit condition Part I.A.1. requires that daily sampling be performed at both Northumberland and Groveton WWTFs for flow rate, pH, and residual chlorine. Additionally, daily sampling for settleable solids at the Groveton WWTF is required.
13. For the monitoring period January 1999 through August 2003, the Town failed to collect 280 flow samples at the Northumberland WWTF.

14. For the monitoring period January 1999 through August 2003, the Town failed to collect 254 flow samples at the Groveton WWTF.
15. For the monitoring period January 1999 through August 2003, the Town failed to collect 163 pH samples at the Northumberland WWTF.
16. For the monitoring period January 1999 through August 2003, the Town failed to collect 160 pH samples at the Groveton WWTF.
17. For the monitoring period January 1999 through August 2003, the Town failed to collect 141 residual chlorine samples at the Northumberland WWTF.
18. For the monitoring period January 1999 through August 2003, the Town failed to collect 138 residual chlorine samples at the Groveton WWTF.
19. For the monitoring period January 1999 through August 2003, the Town failed to collect 263 settleable solids samples at the Groveton WWTF.
20. NPDES Permit condition Part I.A.1. requires that continuous flow measurement be conducted at the Northumberland WWTF.
21. For the monitoring period January 1999 through August 2003, the Town did not use a proper flow meter to provide accurate flow information at the Northumberland WWTF.
22. Pursuant to NPDES Permit condition Part I. D.1.a., changes in volume or character of pollutants received by Publicly Owned Treatment Works of 5000 gallons per day and/or 50 population equivalents and greater requires submittal for approval of a "discharge permit request form" to DES at least 30 days before the proposed changes are to take place. This condition is part of both the Groveton and the Northumberland WWTFs' NPDES Permits.
23. NPDES Permit condition Part I.A.1.e. requires that "when the effluent discharged for a period of 90 consecutive days exceeds 80 percent of the design flow, the permittee shall submit to the permitting authorities a projection of loadings up to the time when the design capacity of the treatment facility will be reached, and a program for maintaining satisfactory treatment levels consistent with approved water quality management plans." This is a condition in the NPDES Permits for both the Groveton and the Northumberland WWTFs.
24. For the monitoring period January 1996 to February 2003, the Town did not notify DES prior to allowing the connection of a 40-unit manufactured home park to the sewer system in Northumberland. This connection exceeds the criteria of NPDES Permit condition Part I.D.1.a.
25. The Northumberland WWTF has been nearly continuously exceeding 80 percent design flow and 100 percent design flow values for the past several years. The Northumberland WWTF exceeded 80 percent design flow for 90 consecutive days during several time periods between January 1999 and August 2003.
26. DES received no loading projections from the Town for the Northumberland WWTF during or following the period January 1999 through August 2003.

27. NPDES Permit condition Part I.A.1. requires that total coliform bacteria levels in the Northumberland WWTF's effluent not exceed 240 counts per 100 millimeters as a maximum daily count.
28. For the monitoring period January 1999 through August 2003, the Town recorded 7 exceedences of the total coliform concentration daily maximum discharge limit at the Northumberland WWTF.
29. NPDES Permit condition Part I.A.1. requires that total coliform bacteria levels in the Groveton WWTF's effluent not exceed 240 counts per 100 millimeters as an average monthly, average weekly and maximum daily count.
30. For the monitoring period January 1999 through August 2003, the Town recorded 28 exceedences of the total coliform concentration discharge limits at the Groveton WWTF, inclusive of the daily maximum, average weekly, and average monthly permit limits.
31. NPDES Permit condition Part I.A.1. requires that effluent Biochemical Oxygen Demand ("BOD") loading levels at the Northumberland WWTF not exceed 15.3 lbs/day as an average monthly, 22.9 lbs/day as an average weekly, and 25.4 lbs/day as a maximum daily mass limit.
32. For the monitoring period January 1999 through August 2003, the Town recorded 4 exceedences of the BOD loading discharge limits at the Northumberland WWTF, inclusive of the average monthly, average weekly, and maximum daily mass limits.
33. NPDES Permit condition Part I.A.1. requires that effluent BOD loading levels at the Groveton WWTF not exceed 92 lbs/day as an average monthly, 139 lbs/day as an average weekly, and 154 lbs/day as a maximum daily mass limit.
34. For the monitoring period January 1999 through August 2003, the Town recorded 6 exceedences of the BOD loading discharge limits at the Groveton WWTF, inclusive of the average monthly, average weekly, and maximum daily mass limits.
35. NPDES Permit condition Part I.A.1. requires that effluent BOD concentration levels at the Groveton WWTF not exceed 30 mg/l as an average monthly, 45 mg/l as an average weekly, and 50 mg/l as a maximum daily limit.
36. For the monitoring period January 1999 through August 2003, the Town recorded 10 exceedences of the BOD concentration discharge limits at the Groveton WWTF, inclusive of the average monthly, average weekly, and maximum daily limits.
37. NPDES Permit condition Part I.A.1. requires that effluent Total Suspended Solids ("TSS") concentration levels at the Northumberland WWTF not exceed 30 mg/l as an average monthly, 45 mg/l as an average weekly, and 50 mg/l as a maximum daily limit.
38. For the monitoring period January 1999 through August 2003, the Town recorded 4 exceedences of the TSS concentration discharge limits at the Northumberland WWTF, inclusive of the average monthly, average weekly, and daily maximum limits.

39. NPDES Permit condition Part I.A.1. requires that effluent TSS loading levels at the Groveton WWTF not exceed 92 lbs/day as an average monthly, 139 lbs/day as an average weekly, and 154 lbs/day as a maximum daily limit.
40. For the monitoring period January 1999 through August 2003, the Town recorded 7 exceedences of the TSS loading discharge limits at the Groveton WWTF, inclusive of the average monthly, average weekly, and maximum daily mass limits.
41. NPDES Permit condition Part I.A.1. requires that effluent TSS concentration levels at the Groveton WWTF not exceed 30 mg/l as an average monthly, 45 mg/l as an average weekly, and 50 mg/l as a maximum daily limit.
42. For the monitoring period January 1999 through August 2003, the Town recorded 1 exceedence of the TSS concentration discharge limits at Groveton WWTF, inclusive of the average monthly, average weekly, and maximum daily limits.
43. DES notes that due to the age of the NPDES Permits for both WWTFs, total coliform, BOD and TSS sampling is only required twice per month. Due to the low sampling frequency required, a clear and accurate depiction of the quality of the effluent waste stream is not captured in the monitoring records. The number of exceedences reported indicates that the effluent from both plants is exceeding the permit limits a significant portion of the time.
44. Pursuant to Env-Ws 405.02 (f) and both the Groveton and the Northumberland WWTFs' NPDES Permits Part II, Section (j), the permittees shall retain records of all monitoring data, monitoring equipment calibration records, equipment maintenance records, strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by the NPDES Permit.
45. Based on the Town's response to DES's April 8, 2003 Notice of Findings, for the monitoring period October 1, 2002 through March 31, 2003, the Town failed to retain monitoring data records at both WWTFs for the following parameters: flow, pH and chlorine residual; and settleable solids at the Groveton WWTF only. The Town never created the monitoring records in the first place.
46. Failure to retain records was also cited as a deficiency during inspections conducted on April 4, 1997, October 15, 1997, May 14, 1999, May 3, 2000, October 12, 2000 and May 22, 2002. Attachment 1 provides a brief summary of the inspection findings.

D. DETERMINATION OF VIOLATIONS

1. The Town violated its NPDES Permits and Env-Ws 405.02 (e) by failing to submit DMRs in a timely manner as described in Paragraphs C.6 through 8 above.
2. The Town violated its NPDES Permits Part I.C. and Part II. (j) by failing to submit accurate reports as described in Paragraphs C. 9-11 above.
3. The Town violated its NPDES Permits Part I A.1. by failing to monitor the parameters specified in Paragraphs C.13 through 19 above at the frequency as specified in Paragraph C.12 above.

4. The Town violated Env-Ws 405.02 (f) and both of its WWTF's NPDES Permits Part II, Section (j), by failing to retain records of all monitoring data, monitoring equipment calibration records, equipment maintenance records, strip chart recordings for continuous monitoring instrumentation and copies of all reports required by the NPDES Permit.
5. The Town violated its NPDES Permit Part I. A.1. by failing to provide continuous flow monitoring equipment at the Northumberland WWTF.
6. The Town violated its NPDES Permit Part I. D.1. a. by failing to submit for approval a "discharge permit request form" to DES at least 30 days before the proposed changes in sewage volume sent to the Northumberland WWTF was to take place.
7. The Town violated its NPDES Permit Part I A.1.e. for the Northumberland WWTF, by failing to fulfill the requirement that "when the effluent discharged for a period of 90 consecutive days exceeds 80 percent of the design flow, the permittee shall submit to the permitting authorities a projection of loadings up to the time when the design capacity of the treatment facility will be reached, and a program for maintaining satisfactory treatment levels consistent with approved water quality management plans.
8. The Town violated its NPDES Permits Part I.A. 1. by discharging wastewater from both of the WWTFs that exceeded the specified limits for the total coliform concentration for the monitoring period January 1999 to August 2003, (inclusive of daily maximum, monthly average concentration and mass limits).
9. The Town violated its NPDES Permits Part I. A.1. by discharging wastewater from both of the WWTFs that exceeded the specified limits for BOD for the monitoring period January 1999 to August 2003, (inclusive of daily maximum and monthly average concentration and mass limits).
10. The Town violated its NPDES Permits Part I A. 1. by discharging wastewater from both of the WWTFs that exceeded the specified limits for TSS for the monitoring period January 1999 to August 2003, (inclusive of daily maximum and monthly average concentration and mass limits).

E. ORDER

Based on the above findings and determinations, DES hereby orders the Town to undertake and complete the following in accordance with the time schedules specified below:

1. **Immediately** increase BOD and TSS effluent sampling and analysis to 2 times/week at the Groveton WWTF and to 1 time/week at the Northumberland WWTF and continue sampling at this frequency until the long-term treatment system upgrades are complete and fully operational or until the NPDES Permits are reissued, whichever occurs later. The Groveton WWTF BOD and TSS samples must be 8-hour composites and the Northumberland WWTF BOD and TSS samples must be grab samples as required in the NPDES Permits. The permit limits and conditions described in the NPDES Permits remain in effect as only the frequency of sampling has been changed by this Order.

2. **Immediately** increase total coliform effluent sampling and analysis to 2 times per week at both the Groveton and the Northumberland WWTFs and continue sampling at this frequency until the long-term treatment system upgrades are complete and fully operational or until the NPDES Permits are reissued, whichever occurs later. The Groveton and Northumberland WWTF total coliform samples must be grab samples as required in the NPDES Permits. At the time of, and not before, NPDES Permit reissuance, the Town shall change from total coliform sampling and analysis to *Escherichia coli* (*E.coli*) sampling and analysis. The permit limits and conditions described in the NPDES Permits remain in effect as only the frequency of sampling has been changed by this Order.
3. **Immediately** submit sewer connection permit requests for all proposed wastewater connections or other discharges to both the Groveton and the Northumberland WWTFs until the long-term treatment system upgrades are complete and fully operational and the WWTFs are no longer operating at or above 80% of the design flow.
4. By **February 15, 2004**, complete and submit a Groundwater Discharge Permit application to DES as described in Task 2-Treatment Plant Evaluation, Item 4 of the October 17, 2003 Provan & Lorber, Inc. Amended Plan of Study and the July 31, 2003 DES-approved Groundwater Discharge Permit Work Scope Proposal prepared by Provan & Lorber.
5. By **February 27, 2004**, complete and submit to DES a report describing the expended efforts, observations, findings, conclusions, recommendations and implementation schedule for each WWTF. The reports shall include all the information as described in Task 2 – Treatment Plant Evaluation, Items 1, 2 and 6 and Task 3 – Flow Meter Evaluations of the October 17, 2003 Provan & Lorber, Inc. Amended Plan of Study and the August 15, 2003 DES-approved Task 3 – Flow Meter Evaluation Recommendation letter prepared by Provan & Lorber. The Northumberland WWTF report shall also include the loadings projections as required by NPDES Permit condition Part I.A.1.e. Upon DES's approval of the recommendations and schedule, the Town shall implement Provan & Lorber's recommendations.
6. By **June 28, 2004**, complete and submit to DES a report describing the findings, conclusions, recommendations, cost benefit analysis and implementation schedule for the Task 1 – Address Excessive Flows Items 1-6 as described in the October 17, 2003 Provan & Lorber, Inc. Amended Plan of Study. Upon DES's approval of the recommendations and schedule, the Town shall implement Provan & Lorber's recommendations.
7. By **March 18, 2005**, submit contract documents to DES for review for the Groveton WWTF lagoon cleaning as described in the December 19, 2003 Provan & Lorber, Inc. Report on Solids Removal from Groveton WWTF Primary Lagoon #2.
8. By **June 27, 2005**, award the contract for the Groveton WWTF lagoon cleaning as described in the December 19, 2003 Provan & Lorber, Inc. Report on Solids Removal from Groveton WWTF Primary Lagoon #2.
9. By **September 30, 2005**, complete the Groveton WWTF lagoon cleaning as described in the December 19, 2003 Provan & Lorber, Inc. Report on Solids Removal from Groveton WWTF Primary Lagoon #2. This date was originally proposed at August 26, 2005 by Provan & Lorber, Inc. Due to the unknown quantity of sludge in Lagoon #2, DES extended this deadline to give the Town ample time to complete this task.

10. Send all correspondence and all data, reports and other submissions required by this Order to:

Ms. Sharon L. Ducharme P.E.
DES-WD/WWEB
P.O. Box 95
Concord, NH 03302-0095

copy to: Ms. Joy Hilton
USEPA Region 1/Water Technical Unit
1 Congress St., Suite 1100
Boston, MA 02114-2023


F. STIPULATED PENALTIES

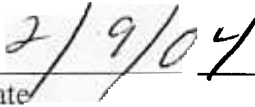
1. In accordance with Env-C 603.08(c), the Town agrees to pay \$100 per permit limit violation, and \$200 for each DMR form that is returned by DES to the Town for correction between the date of issuance of this Order and until complete implementation of the recommended upgrades and the sludge removal from the Groveton lagoons. If payment is not postmarked by the 15th day of the month following the violation(s), the stipulated penalty will increase to \$500.00 per violation. If the payment is not postmarked by the last day of the month following the violation(s), the stipulated penalty will increase to \$1,000.00 per violation. If the Town fails to pay the stipulated penalty within 60 days, the stipulated penalty will increase to \$2,000 per violation.
2. In accordance with Env-C 603.08(c), the Town agrees to pay \$200 for each sample that is not collected at the frequency specified in this Order (BOD, TSS and total coliform) or in the NPDES permits (SS, pH, and TRC) between the date of issuance of this Order and until complete implementation of the recommended upgrades and the sludge removal from the Groveton lagoons. If the DMR and payment are not postmarked by the 15th day of the month following the violation(s), the stipulated penalty will increase to \$500.00 per violation. If the DMR and payment are not postmarked by the last day of the month following the violation(s), the stipulated penalty will increase to \$1,000.00 per violation. If the Town fails to pay the stipulated penalty within 60 days, the stipulated penalty will increase to \$2,000 per violation.
3. In accordance with Env-C 603.08(a), the Town agrees to pay \$2,000 per calendar month or portion thereof that compliance is not achieved after the deadline specified in the Order for each provision of the Order not complied with. The Town must also provide the information as described in Attachment 2, at least 30 days prior to any deadline, if the Town anticipates exceeding the deadline.
4. If stipulated penalties become due, payment shall be submitted to DES with the monthly DMR. Payment shall be in the form of a certified check made payable to the "New Hampshire Water Pollution Control Association" ("NHWPCA"). Penalty proceeds will be used to purchase equipment for loan to wastewater treatment facilities for compliance assistance and trouble-shooting, and for developing and improving training programs for wastewater treatment plant operators. The DMR and any payment shall be mailed to NHDES Water Division, Wastewater Engineering Bureau, Attn: Sharon L. Ducharme, P.E., P.O. Box 95, Concord, NH 03302-0095.
5. Nothing in this agreement shall be construed to limit DES's ability to take further enforcement against the Town for continued non-compliance, including without limitation referral to the New Hampshire Department of Justice.

G. CONSENT AND WAIVER OF APPEAL

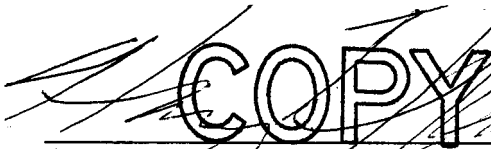
1. By execution of this Administrative Order by Consent, the Town agrees that this Order shall apply to and be binding upon the Town, its officers, directors, successors and assigns, and agrees that this Order may be entered and enforced by a court of competent jurisdiction
2. By execution of this Administrative Order by Consent, the Town waives any right to appeal this Administrative Order by Consent provided by statute, rule or common law, including without limitation the right to appeal the Water Council, and waives any right to object to the entry and enforcement of this order by a court of competent jurisdiction.

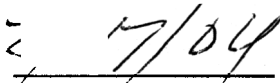
TOWN OF NORTHUMBERLAND


By:
Chairman, Board of Selectmen
Duly Authorized

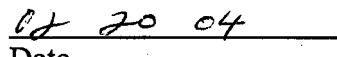

Date

NH DEPARTMENT OF ENVIRONMENTAL SERVICES


COPY
Harry T. Stewart, P.E., Director
Water Division


Date


COPY
Michael P. Nolin, Commissioner


Date

Attachments: Attachment 1 Inspection Findings Summary
Attachment 2 Time Extension Request Guidelines

cc Selectmen, Northumberland
Mark Harbaugh, DES Legal Unit
Joy Hilton, USEPA
Sharon Ducharme, P.E., NHDES WWEB
Richard Marshall, Northumberland WWTF operator
Andrew Sharpe, P.E., Provan & Lorber, Inc.

Attachment 1 - Northumberland/Groveton Inspection Findings

Deficiency Cited	Inspection Date					
	4/4/1997	10/15/1997	5/14/1999	5/3/2000	10/12/2000	5/22/2002
No bench sheets for chlorine and pH/incomplete bench sheets	X	X	X			
No Std Methods 18th Ed. on hand	X					
No blanks performed/recorded	X	X				X
No distilled water on premises	X					
Dirty glassware/probes	X					X
Exceeding holding times for pH and chlorine	X	X				
No weekend sampling and sometimes only 1/week sampling	X	X	X			X
TSS & BOD grabs instead of 8-hour composites	X	X				
Improper pH probe storage	X			X		
Flow monitoring is not continuous	X	X				
DMR reporting violations - FOA, sample type, calculations	X			X		X
No certified operator in responsible charge of WWTP	X	X				
No stds or duplicates for chlorine and pH		X	X		X	
Improper pH and chlorine probe calibration		X		X		
Improper SS sampling		X				
No back up power at either plant		X	X			
Poor effluent quality (Groveton only)		X				
Poor grit box O&M (Groveton) - improper storage/disposal of grit		X				
Non-authorized person signing DMRs			X	X		
Improper coliform sampling				X		
No thermometer in sampling refrigerator						X
No written QAM					X	
Expired reagents and standards						
No alarm for power loss, chlorine, aeration				X		
No certified back up operator				X		
No log book/not maintaining records				X	X	X
No emergency response plan				X		X
Exceeding 80% design flow (Northumberland)				X		
Not calibrating or checking accuracy of flow meters					X	
Not including addl sampling in DMR calculations						X

Attachment 2
**DES WWEB COMPLIANCE SECTION POLICY ON REQUESTING A TIME
EXTENSION ON ENFORCEMENT ACTIONS**

DES expects all Respondents to continuously and diligently pursue implementation of the actions required in Administrative Orders and Administrative Orders by Consent (collectively, "Order") and to immediately notify DES of any delays in meeting the deadlines specified. Reasonable changes to the implementation schedule will not be unreasonably withheld by DES. If the Respondent misses a deadline due to circumstances beyond its control, stipulated penalties will not become due relative to that specific deadline. Failure to secure funding for the required actions or failure of a consultant to meet deadlines shall not be construed as beyond the Respondent's control.

To request a time extension for the compliance dates in an Order, the following information must be submitted in writing as soon as the Respondent is aware of the need, but no less than 30 days prior to the deadline proposed to be changed. Attachments may be used to supplement this information but they should not be used to replace the written submission.

1. Explain the requested changes to the Order. Be very specific. For example, if you are going to propose a change in a date in the Order, submit the proposed date in the cover letter.
2. Discuss who developed the original dates and how these dates were selected. Were other affected parties, such as suppliers and contractors, consulted? If so, list them and summarize their comments. If not, explain why not.
3. List any other extensions requested. Explain why these extensions were needed. Were the extensions granted? Explain the effect of these other extension requests on the present request.
4. If the dates requested were used in the Order, explain in detail why these requested changes could not have been anticipated and addressed when the dates were proposed.
5. If violations of the NPDES permit or NH Water Quality Standards are anticipated during the requested extension period, explain interim measures that will be implemented to minimize or eliminate the potential violations.
6. Explain the potential effects on human health or the environment these changes may cause. For example, if the request was to postpone the installation of dechlorination equipment, describe the effects on the aquatic life. If a deleterious effect on human health and the environment is anticipated, explain interim measures that will be used to minimize the effect.
7. Explain what could cause the need for any other extension requests in the future and what is presently being done to avoid them.
8. Submit this request to DES to Sharon Ducharme's attention, with a copy to Joy Hilton at USEPA at the following addresses:

Sharon L. Ducharme, P.E.
NH Dept. of Environmental Services
Compliance Section, WWEB
P.O. Box 95
Concord, NH 03301

Joy Hilton
USEPA Region 1
Water Technical Unit
P.O. Box 8127
Boston, MA 02114-8127